

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**COAST TO COAST HEALTH CARE  
SERVICES, INC.**

**Plaintiff,**

**v.**

**COAST TO COAST HEALTHCARE  
RECRUITERS, INC.**

**Defendant.**

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**Civil Action No. 09-cv-906**

**Judge Algenon L. Marbley**

**Magistrate Judge Terence P. Kemp**

**CONSENT JUDGMENT**

Plaintiff Coast to Coast Health Care Services, Inc. ("Coast To Coast") and Defendant Coast to Coast Healthcare Recruiters, Inc. ("Defendant") have agreed to a settlement of their differences in the form of this Consent Judgment.

Accordingly, it is hereby ORDERED, ADJUDGED AND DECREED that:

1. Defendant is permanently enjoined from using the term "Coast to Coast" as a brand, logo, trademark, service mark, domain name or other source identifier in connection with any sale, promotion or marketing of Defendant's products or services, subject to the terms outlined below in Paragraphs 2 and 3 of this Consent Judgment.

2. Defendant shall remove "Coast to Coast" from its website, voice mail, email addresses, letterhead, business cards, brochures, marketing materials, advertisements, and other business displays within sixty (60) days of the entry of this Consent Judgment. Defendant shall select another brand and/or logo within sixty (60) days of the entry of this Consent Judgment that shall not include the word "Coast to Coast" or any derivative or

similar words. This brand or logo shall be subject to the approval of Coast to Coast, which approval shall not be unreasonably delayed or withheld.

3. Within sixty (60) days of the entry of this Consent Judgment, Defendant hereby agrees and shall transfer the domain name (URL) [www.coasttocoasthealthcare.com](http://www.coasttocoasthealthcare.com) to Coast To Coast. Within ten (10) days after that transfer, Coast To Coast shall issue a certified check payable to Jeffrey Tatz in the amount of One Thousand Dollars (\$1,000.00) for reimbursement in connection with any transition costs associated with that domain name transfer.

4. Defendant waives, releases and dismisses with prejudice all defenses and counterclaims that could have been brought in this case styled *Coast to Coast Health Care Services, Inc. v. Coast to Coast Healthcare Recruiters, Inc.*, Case No. 09 Civ. 10801, United States District Court for the Southern District of Ohio, Eastern Division (the "Action").

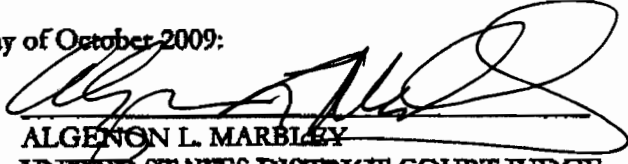
5. Coast to Coast waives, releases and dismisses with prejudice all claims brought or that could have been brought against Defendant in the Action on the condition that Coast to Coast Healthcare Recruiters, Inc. complies with all provisions of this Consent Judgment. Notwithstanding the above, if Defendant fails to comply with any part or parts of Paragraphs 1, 2, and/or 3 of this Consent Judgment, Coast to Coast may institute claims against Defendant for trademark infringement, enforcement of this Consent Judgment, and/or for breach of contract arising out of this Consent Judgment. In the event that Coast To Coast substantially prevails on one or any of those claims, Defendant shall pay all of Coast To Coast's reasonable attorneys' fees and litigation costs incurred in any such litigation.

6. Each party shall bear its own costs, including attorneys fees, incurred in the Action.

7. Each party has received independent legal advice about its rights or asserted rights arising out of matters in controversy in the Action, about its ability to derive any benefit from this Consent Judgment, and about the advisability of making and agreeing to this Consent Judgment.

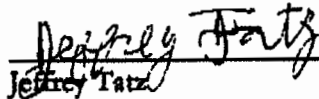
8. This Court shall retain jurisdiction to enforce the terms of this Consent Judgment.

IT IS SO ORDERED this 26 day of October 2009:




ALGENON L. MARBLEY  
UNITED STATES DISTRICT COURT JUDGE

AGREED AND APPROVED:



Jeffrey Tatz

President and CEO  
Coast to Coast Healthcare Recruiters, Inc.  
2078 Great Shoals Circle  
Lawrenceville, Georgia 30045  
Phone: (404) 537-1378  
As President and CEO of Defendant Coast to Coast Healthcare Recruiters, Inc.



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